

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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	)	No. 03 MDL 1570 (GBD/SN)
In re Terrorist Attacks on September 11, 2001	)	
	)	ECF Case
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This document relates to:

*Federal Insurance Co., et al. v. Al Qaida, et al.*, 03-cv-06978  
*Thomas E. Burnett, Sr., et al. v. Al Baraka Inv. & Dev. Corp., et al.*, 03-cv-09849  
*Estate of John P. O'Neill, Sr., et al. v. Al Baraka Inv. & Dev. Corp., et al.*, 04-cv-01923  
*Continental Casualty Co., et al. v. Al Qaeda, et al.*, 04-cv-05970  
*Cantor Fitzgerald & Co., et al. v. Akida Bank Private Ltd., et al.*, 04-cv-07065  
*Euro Brokers Inc., et al. v. Al Baraka Inv. & Dev. Corp., et al.*, 04-cv-07279

**DECLARATION OF STEVEN T. COTTREAU, ESQ.**

I, Steven T. Cottreau, declare that I am over the age of eighteen years and of sound mind to make this declaration. I have personal knowledge of the facts set forth below. If called as a witness, I could and would testify to these facts, all of which are true and accurate to the best of my knowledge and belief:

I am an attorney admitted in the above-captioned matter, and a partner in the law firm Jones Day, counsel to Defendant Dubai Islamic Bank (“DIB”). I submit this declaration to transmit to the Court the following documents submitted in support of DIB’s Opposition to Plaintiffs’ Motion to Compel, filed in the above-captioned matter on September 19, 2022.

1. Exhibit 1 is a true and accurate copy of the Court’s Order on Plaintiffs’ Motion to Compel dated July 11, 2018.

2. Exhibit 2 is a true and accurate copy of excerpts of the deposition of Alan Fine dated October 4, 2019.

3. Exhibit 3 a true and accurate copy of DIB's Memorandum in Opposition to Plaintiffs' Motion to Compel dated November 13, 2017.

4. Exhibit 4 is a true and accurate copy of DIB's Memorandum in Opposition to Plaintiffs' Motion to Compel dated September 30, 2015.

5. Exhibit 5 is a true and accurate copy of a letter from Steven Cottreau to Sean Carter dated September 8, 2011.

6. Exhibit 6 is a true and accurate copy of a letter from Steven Cottreau to Sean Carter dated July 7, 2011.

7. Exhibit 7 is a true and accurate copy of an email from J. Scott Tarbutton to Steven Cottreau dated July 15, 2011.

8. Exhibit 8 is a true and accurate copy of an excerpt of the transcript of the March 22, 2016 hearing before United States Magistrate Judge Frank Maas.

9. Exhibit 9 is a true and accurate copy of the Third Declaration of Dr. Haroun Dharsey dated September 16, 2022.

10. Exhibit 10 is a true and accurate copy of the Declaration of Bader Ibrahim Abdullah Al Maazmi dated November 10, 2021.

11. Exhibit 11 is a true and accurate copy of the Second Declaration of Dr. Haroun Dharsey dated September 16, 2022.

12. Exhibit 12 is a true and accurate copy of an excerpt of the deposition of Brian Michael Jenkins dated April 12, 2021.

13. Exhibit 13 is a true and accurate copy of Plaintiffs' Amended Initial Disclosures dated December 31, 2010.

14. Exhibit 14 is a true and accurate copy of Plaintiffs' Discovery Chart dated November 13, 2018.

15. Exhibit 15 is a true and accurate copy of the Declaration of Yahya Saeed Ahmad Lootah dated September 16, 2022, with accompanying Exhibits 1 and 2.

16. Exhibit 16 is a true and accurate copy of the Declaration of Abdulrahman Mohamed Al Ansari dated June 16, 2022, with accompanying Exhibit C.

17. Exhibit 17 is a true and accurate copy of a letter from J. Scott Tarbutton to Steven Cottreau dated October 10, 2016.

18. Exhibit 18 is a true and accurate copy of a letter from Steven Cottreau to Sean Carter, Scott Tarbutton, and Robert Haefele dated July 29, 2022.

19. Exhibit 19 is a true and accurate copy of the Declaration of Haroun Dharsey dated November 30, 2021.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 19, 2022.

/s/ Steven T. Cottreau

Steven T. Cottreau, Esq.

JONES DAY

51 Louisiana Avenue, N.W.

Washington, D.C. 20001

Telephone: (202) 879-3939

Email: scottreau@jonesday.com